



California Regional Water Quality Control Board

Central Coast Region



Linda S. Adams
Secretary for
Environmental Protection

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Arnold Schwarzenegger
Governor

December 6, 2007

Ms. Mary Dyas
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET 07-AFC-8	
DATE	DEC 08 2007
RECD.	DEC 11 2007

Dear Ms. Dyas:

CARRIZO ENERGY SOLAR FARM PROJECT (07-AFC-8) REVIEW; CARRIZO PLAIN, SAN LUIS OBISPO COUNTY; DOCUMENT REVIEW AND COMMENT

Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff reviewed URS Corporation Americas, October, 2007, *Application for Certification Carrizo Energy Solar Farm*. The Central Coast Water Board is a responsible agency under the California Environmental Quality Act (CEQA). Thank you for the opportunity to review and comment on the data adequacy phase of the California Energy Commission project certification process. The Central Coast Water Board staff understands that the project includes construction and operation of a 640-acre solar thermal power plant. The plant construction and operation will require compliance with various regulations and permits administered or issued by either the State Water Resources Control Board (State Board) or the Central Coast Water Board.

The following items have been identified as applicable and appropriate requirements that must be addressed in future planning documents for the project.

1. Compliance with the Aboveground Petroleum Storage Act (APSA) (Chapter 6.67 of the California Health and Safety Code - Sections 25270-25270.13) and Title 40 of the Code of Federal Regulations Section 112. Owners or operators of aboveground petroleum storage tanks subject to the APSA are required to (1) file a storage statement with the State Water Resources Control Board, (2) pay a facility fee, and (3) prepare and implement a federal Spill Prevention Control & Countermeasure (SPCC) plan.

Information regarding the aboveground petroleum storage tank program and its requirements, including links to APSA, 40 CFR 112, and SPCC plan references can be viewed and downloaded from the State Water Resources Control Board Clean Water Program's web site located at <http://www.waterboards.ca.gov/cwphome/agt/index.html>. The storage statement requirements, fee schedule, and mailing address of the State Water Resources Control Board are also outlined on the web site. For additional information, please call Corey Walsh at (805) 542-4781, cwalsh@waterboards.ca.gov.

2. We recommend you consider Low Impact Development (LID) design techniques for your proposed project. LID or equivalent methods are necessary to mitigate stormwater runoff pollution and stream erosion and sedimentation impacts that result from significantly increased downstream flows due to introduced impermeable surfaces.

LID is an alternative site design strategy that uses natural and engineered infiltration and storage techniques to control stormwater runoff where it is generated. The objective is to disperse LID devices uniformly across a site to minimize runoff. LID serves to preserve the hydrologic and environmental functions altered by conventional stormwater management. LID methods provide temporary retention areas; increase infiltration; allow for pollutant removal; and control the release of stormwater into adjacent waterways (Anne Guillette, Whole Building Design Guide). For further reference please see: <http://www.epa.gov/owow/nps/lid/>. For additional information, please call **Dominic Roques** at (805) 542-4780, droques@waterboards.ca.gov.

3. Obtain General Permit for Storm Water Discharges Associated with Construction Activity (General Permit) coverage prior to grading. The State Board has adopted a statewide General Permit that applies to all projects that disturb one or more acres of land. The purpose of the permit is to ensure that "storm water discharges shall not cause or threaten to cause pollution, contamination, or nuisance". A site-specific Storm Water Pollution Prevention Plan (SWPPP) is required prior to grading, as described in the General Permit. For further reference please see: <http://www.waterboards.ca.gov/centralcoast/stormwater/construction/index.htm>. For additional information, please call **David Innis** at (805) 549-3150, dbinnis@waterboards.ca.gov.

4. Obtain General Industrial Activities Storm Water Permit (General Permit). Standard Industrial Classification (SIC) Code requires permit coverage under the General Permit. SIC Code - 4911 Electric Services. Establishments engaged in the generation, transmission, and/or distribution of electric energy for sale is covered by the General Permit <http://www.waterboards.ca.gov/stormwtr/docs/induspmnt.pdf>. For additional information, please call **David Innis** at (805) 549-3150, dbinnis@waterboards.ca.gov.

5. The Central Coast Water Board must certify that any permit issued by the Army Corps of Engineers pursuant to Section 404 of the Clean Water Act complies with state and federal water quality standards. Section 401 Water Quality permit is necessary for all Section 404 permits, including reporting and non-reporting Nationwide permits. Section 401 applications will be reviewed by this office after the Section 404 permit process has begun. Additionally, any project that involves disturbance of a stream bank or riparian area must also obtain a Streambed Alteration Agreement from California Department of Fish and Game.




For additional information, please call, **Bill Hoffmann** at (805) 549-3691, bhoffmann@waterboards.ca.gov.

6. In addition, the operation and maintenance of the facility, e.g. washing of Fresnel Reflectors, may require issuance of Waste Discharge Requirements (WDR) with respect to the discharge of any waste that can affect the quality of the ground or surface waters of the state. Consideration for WDR enrollment or a waiver of WDRs requires submittal of a report of waste discharge to the Central Coast Water Board.

Additional information is available for review at the Central Coast Water Board's web site: <http://www.waterboards.ca.gov/centralcoast/>.

Sincerely,



 Roger W. Briggs
Executive Officer

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cc:

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